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4 Attorney for Plaintiff

Maureen Harrington,

5 *as personal representative for the*
estate of Blaine Harrington III

6
7 IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

8 MAUREEN HARRINGTON,
AS PERSONAL REPRESENTATIVE
FOR THE ESTATE OF BLAINE
9 *HARRINGTON III,*

10 Plaintiff,

11 v.

12 DEEPAK DUGAR, M.D. a MEDICAL
CORPORATION,

13 Defendant.

Civil Action No. 2:22-cv-08230-HDV-
E

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION TO
GRANT PERMISSION TO
ATTEND THE MOTION FOR
ATTORNEY FEES HEARING
REMOTELY**

DATE: August 8, 2024

TIME: 10:00 a.m.

JUDGE: Hernán D. Vera

CTRM: First Street Courthouse, 350 W.
1st Street, Courtroom 5B, 5th Floor, Los
Angeles, California 90012

1 PLEASE TAKE NOTICE that, Plaintiff/counter-defendant Maureen
2 Harrington (“Plaintiff”), as personal representative for the estate of Blaine
3 Harrington III (“Blaine”), hereby files this motion to request the Court to allow
4 Plaintiff’s counsel to attend the Motion for Attorney Fees hearing remotely, and
5 states as follows:

6 1. On June 13, 2024, Plaintiff filed her Motion for Attorney Fees. See
7 D.E. 201.

8 2. Mr. DeSouza served as lead trial counsel and will likewise be the
9 attorney taking point at the Motion for Attorney Fee hearing. Mr. DeSouza is a
10 Florida-based attorney.

11 3. As indicated by defendant Deepak Dugar M.D., a Medical
12 Corporation’s (“Defendant”) Memorandum in Opposition Plaintiff’s Motion for
13 Attorney Fees [D.E. 216], the Parties disagree about fees, as well as costs.

14 4. To be mindful of the costs both sides have already incurred, and to try
15 and minimize the further costs incurred, Plaintiff respectfully request that the Court
16 allow Plaintiff to appear at the Motion for Attorney Fees hearing via zoom, or
17 another remote method.

18 5. Undersigned counsel spoke with Jeffrey Squires, Esq., who is counsel
for Defendant.

6. Mr. Squires indicated that he takes no position on Plaintiff’s request.

1 7. The relief requested is not made in bad faith, will not cause undue
2 delay, nor will it prejudice either party.

3 **WHEREFORE**, Plaintiff respectfully requests that the Court enter an
4 Order: (a) permitting Plaintiff to attend the Motion for Attorney Fees hearing via
5 zoom; and (b) for such further relief as the Court deems proper.

6 **LOCAL RULE 7.3 CERTIFICATE**

7 Before filing this Motion, undersigned counsel conferred with counsel for
8 Defendant (Jeffrey L. Squires, Esq.), who has taken no position on the relief
9 requested.

10 Dated: July 25, 2024.

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14 *Attorneys for Plaintiff*

15 By: /s/ Lauren M. Hausman
Lauren M. Hausman, Esq.
16Scott E. Radcliffe, Esq.
Daniel DeSouza, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record.

/s/ Lauren M. Hausman
Lauren M. Hausman, Esq.